



**Filed Electronically**

April 1, 2002

Secretary Magalie Roman Salas  
Federal Communications Commission  
445 Twelfth Street, SW, Room TWB-204  
Washington, D.C. 20554

**RE: CC Docket Nos. 99-273; 92-105; 92-237**

Dear Ms. Roman Salas:

The Telecommunications Research and Action Center (TRAC) submits this letter in response to the above referenced proceedings. TRAC intends to file more extensive comments during the Reply Comment period. TRAC is a non-profit, national consumer group, concerned with promoting the best interests of telecommunications customers. TRAC has long advocated for the interests of residential telephone consumers, local and long distance, and has published TeleTips™, a consumer's guide to long distance rates and services since 1983. In 1999, TRAC published its first *A Consumer's Guide to Long Distance and Local Directory Assistance Calling*.<sup>1</sup> TRAC has since that time followed closely the rates and services associated with directory assistance.

TRAC has been appalled at the rapid escalation in the cost of directory assistance, primarily that associated with the long distance industry. TRAC notes, however, that residential 411 service has not escalated nearly as rapidly as has interstate DA. TRAC welcomes changes to the DA system that would in fact result in lower rates and better service to consumers. We are concerned though that the solution lies not in inserting artificial "competition" that eliminates efficiencies of scope and scale, drives up prices

and adds to consumer confusion. We are also concerned that any effort to further deregulate intrastate DA (411 service) will fundamentally alter the nature of “basic residential telephone service” in most States, contrary to the Telecommunications Act of 1996.

411 service is inherently connected to White Pages listing and directory service, an essential element of basic telephone service. Consumer’s interest is in maintaining or increasing the number of DA calls wrapped into their local phone service. Any actions by this Commission to require further unbundling of DA directly or indirectly through number assignment would not be in the public interest and may be contrary to the Telecommunication Act of 1996.

Sincerely,

A handwritten signature in cursive script that reads "Dirck A. Hargraves". The signature is written in dark ink and is positioned above the printed name.

Dirck A. Hargraves. Esq.  
Counsel

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<sup>1</sup> See attached April 12, 2001 Press Release.